

**REMARKS**

In the Office Action<sup>1</sup>, the Examiner rejected claims 62 and 63 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,721,736 to Krug et al. (“*Krug*”); rejected claim 64 under 35 U.S.C. § 103(a) as being unpatentable over *Krug* in view of the “XBRL Specification” by Hamscher et al. (“*Hamscher*”); rejected claims 1, 2, 5, 6, 11-18, 21, 24-31, 34, 37-43, 46, 49-55, and 59-61 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,370,549 to Saxton (“*Saxton*”) in view of U.S. Patent Application Publication No. 2002/0052954 to Polizzi et al. (“*Polizzi*”); rejected claims 3, 4, 19, 20, 32, 33, 44, 45, 56, and 57 under 35 U.S.C. § 103(a) as being unpatentable over *Saxton*, in view of *Polizzi*, and further in view of *Hamscher*; and rejected claims 8-10, 23, 36, 47, 48, and 58 under 35 U.S.C. § 103(a) as being unpatentable over *Saxton*, in view of *Polizzi*, and further in view of U.S. Patent No. 6,134,563 to Clancey et al. (“*Clancey*”).

Applicants’ representatives thank Examiner Nguyen and Examiner Bashore for the time and courtesy in extending Applicants’ representatives an interview to discuss this pending application. Claims 1-64 are currently pending. Of these, claims 1, 17, 29, 30, 42, 54, and 62 are independent.

**I. Regarding the rejection of claims 62 and 63 under 35 U.S.C. § 102(e) as being anticipated *Krug***

Applicants respectfully traverse the rejection of claims 62 and 63 under 35 U.S.C. § 102(e) as anticipated by *Krug*. In order to properly establish that *Krug*

---

<sup>1</sup> The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 62 recites a data processing system, comprising:

a parser that:  
receives one or more text documents,  
interprets tags included in the one or more text documents to  
create software elements, and  
determines the hierarchy of the software elements within a  
structure representative of the one or more text documents.

*Krug* discloses a meta search engine wherein "a search response provided from a primary search engine in a search response representation is processed by the meta search engine" (col. 3, lines 30-32). An "HTML search response document 10 is returned by a primary search engine 6" (col. 7, lines 47-48 and Fig. 2 and 3). A syntax tree parser 20 "analyses the HTML syntax structure of the search result document by recognizing the HTML tags within the document and constructing a hierarchical HTML syntax tree that represents the hierarchical relationship of the syntax elements (tags)" (col. 8, lines 23-27).

*Krug* analyses the HTML syntax structure by recognizing tags and constructs a syntax tree that represents the hierarchical relationship of the tags. In contrast, claim 62 requires interpreting tags "included in the one or more text documents to create software elements."

During the interview, Examiner Bashore asked Applicants to cite a passage in the specification to give an example of the claimed “software elements.” Applicants direct the Examiner to the Specification at page 18, paragraph 059, which states:

RDX parser 204 accepts documents such as ASCII text documents containing XBRL tags and transforms them into internal RDX documents or NDOMs. NDOMs are software elements of a standard format corresponding to the sections of the XBRL taxonomy document. The NDOMs form a tree structure corresponding to a structure described in the XBRL taxonomy document. In other words, the NDOMs as a group are software representations of an XBRL taxonomy document in a standard format. After RDX parser 204 translates the text documents, creates the NDOMs and links them in a structure analogous to the input taxonomy document, the NDOMs can be used by RDX manager 206.

Applicants submit that at least this passage provides a teaching of the claimed “software elements.” *Krug* does not teach or suggest the creation of software elements. *Krug* constructs a syntax tree that represents tags, not software elements created by interpreting tags.

During the interview, Examiner Bashore stated that the syntax tree may be viewed as a software element. Applicants respectfully disagree. Even assuming, absent any teaching in *Krug*, that the syntax tree may be viewed as a software element, the syntax tree “represents the hierarchical relationship of the syntax elements (tags)” (col. 8, lines 26-27). In contrast, claim 1 recites determining “the hierarchy of the software elements.” The syntax tree in *Krug* represents a hierarchical relationship of tags, not software elements. Therefore, even assuming that the syntax tree may be viewed as a software element, which Applicants do not concede, *Krug* does not teach or

suggest determining “the hierarchy of the software elements within a structure representative of the one or more text documents,” as recited in claim 62.

*Krug* fails to teach or suggest at least these elements. Accordingly, *Krug* cannot anticipate claim 62, nor can the reference render the claim obvious. Claim 63 is also allowable at least because it depends from independent claim 62.

**II. Regarding the rejection of claim 64 under 35 U.S.C. § 103(a) as being unpatentable over *Krug* in view of the *Hamscher***

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claim 64 under 35 U.S.C. § 103(a) because a *prima facie* case of obviousness has not been established with respect to this claim.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a), each of three requirements must be met. First, all the claim limitations must be taught or suggested by the prior art. See M.P.E.P. § 2143.03 (8th ed., rev. 3, Aug. 2005). Second, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the references in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must “be found in the prior art, not in applicant’s disclosure.” M.P.E.P. § 2143 (8th ed., rev. 3, Aug. 2005).

A *prima facie* case of obviousness has not been established because, among other things, neither *Krug* nor *Hamscher*, taken alone or in combination, teach or suggest each and every element recited by Applicants’ claim.

Claim 64 depends from claim 62 and therefore includes all of the elements recited therein. The Examiner admits that *Krug* does not “disclose the structure is a Numerator Document Object Model” (Office Action at page 4). However, the Examiner relies on *Hamscher* for allegedly teaching this claimed element (Office Action at page 4).

Even assuming this allegation is true, which Applicants do not concede, *Hamscher* fails to cure the deficiencies of *Krug* discussed above. *Hamscher* is directed to a XBRL specification for defining XBRL elements and attributes that can be used in the creation, exchange, and comparison tasks of financial reporting (Abstract). *Hamscher* does not teach or suggest a parser that “interprets tags included in the one or more text documents to create software elements, and determines the hierarchy of the software elements within a structure representative of the one or more text documents,” as recited in independent claim 62 and required by dependent claim 64.

Therefore, *Hamscher* fails to cure the above-identified deficiencies of *Krug*, and Applicants respectfully request that the Examiner withdraw the rejection of claim 64 under 35 U.S.C. § 103(a).

**III. Regarding the rejection of claims 1, 2, 5, 6, 11-18, 21, 24-31, 34, 37-43, 46, 49-55, and 59-61 under 35 U.S.C. § 103(a) as being unpatentable over *Saxton* in view of *Polizzi***

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1, 2, 5, 6, 11-18, 21, 24-31, 34, 37-43, 46, 49-55, and 59-61 because a *prima facie* case of obviousness has not been established with respect to these claims.

Claim 1 recites a data processing system comprising, for example:

a parser . . .

an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report and retrieves data from one or more sources to represent one or more values within the report,

wherein a mapper generates a relationship between the data from the one or more sources and the one or more values to be placed within the report.

*Saxton* discloses receiving a file location request from a program module and responding with a file location identifying the location of one or more component files within a directory tree structure (col. 2, lines 17-19). The Examiner admits that *Saxton* does not disclose “an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report and retrieves data from one or more sources to represent one or more values within the report, wherein a mapper generates a relationship between the data from the one or more sources and the one or more values to be placed within the report” (Office Action at page 5).

*Polizzi* does not cure the deficiencies of *Saxton*. *Polizzi* discloses a “computer system [that] uses a portal architecture to allow a user to view a wide variety of content retrieved from a variety of different computer systems” (paragraph 0004). Repository 235 “is used as a storage device for all information that is to be stored in the portal system” (paragraph 0024). These objects, which may include HTML files, job output reports, executable job files, image files, etc., are stored in repository 235 and arranged “in a hierarchy called categories” (paragraph 0024). *Polizzi* also discloses that a job may produce an output report that may be stored in repository 235 after the job is

complete (paragraph 0025). The output report may be based upon retrieved data (Abstract).

The Examiner states that the jobs prepare a report (Office Action at page 5). The Examiner also alleges that *Polizzi* inherently contains a mapper since *Polizzi*'s system prepares a report (Office Action at page 5). *Polizzi* discloses jobs that generate reports by processing data retrieved from backend databases 200, 205, and 210 or from data resident in portal system 120 (paragraph 0025). The generation of a report that contains processed data does not inherently teach "a mapper." The Examiner's allegation is not supported by any teaching in *Polizzi*, and Applicants request that the Examiner cite a specific teaching to support the Examiner's statement that the preparation of a report *must* inherently contain a mapper.

Even assuming that *Polizzi* discloses a mapper, which Applicants do not concede, there is no teaching that the report contains anything more than a series of values. *Polizzi* does not teach a report that contains a relationship between elements, and *Polizzi* contains no teaching that a mapper inherently "generates a relationship." Moreover, even if the data in the reports contain a relationship, which Applicants do not concede, there is no teaching in *Polizzi* that a relationship exists between "the data from the one or more sources and the one or more values." One of ordinary skill would recognize that a report that includes a series of values or status indicators does not *inherently* include a relationship between "the data from the one or more sources and the one or more values." Therefore, *Polizzi* fails to teach or suggest a mapper that "generates a relationship between the data from the one or more sources and the one or more values to be placed within the report," as recited in claim 1.

Accordingly, *Saxton* and *Polizzi* fail to establish a *prima facie* case of obviousness with respect to claim 1, at least because the references fail to teach each and every element of the claim. Claims 2, 5, 6, and 11-16 depend from claim 1 and are thus also allowable for at least the same reasons as claim 1.

Independent claims 17, 29, 30, 42, and 54, though of different scope from claim 1, recite limitations similar to those set forth above with respect to claim 1. Claims 17, 29, 30, 42, and 54 are therefore allowable for at least the reasons presented above. Claims 18, 21, 24-29, 31, 34, 37-41, 43, 46, 49-53, 55, and 59-61 are also allowable at least due to their dependence from claims 17, 29, 30, 42, and 54 respectively.

**IV. Regarding the rejection of claims 3, 4, 19, 20, 32, 33, 44, 45, 56, and 57 under 35 U.S.C. § 103(a) as being unpatentable over *Saxton*, in view of *Polizzi*, and further in view of *Hamscher***

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 3, 4, 19, 20, 32, 33, 44, 45, 56, and 57 because a *prima facie* case of obviousness has not been established with respect to these claims.

The Examiner admits that the combination of *Saxton* and *Polizzi* does not disclose “wherein the one or more text documents are XBRL documents” and “wherein the parser creates the software elements having the format with the hierachal relationship by interpreting tags included in the one or more text documents” (Office Action at page 9). However, the Examiner relies on *Hamscher* for allegedly teaching these claimed elements (Office Action at page 9).

Even assuming this allegation is true, which Applicants do not concede, *Hamscher* fails to cure the deficiencies of *Saxton* and *Polizzi* discussed above. As previously stated, *Hamscher* is directed to a XBRL specification for defining XBRL

elements and attributes that can be used in the creation, exchange, and comparison tasks of financial reporting (Abstract). *Hamscher* does not teach or suggest “an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report and retrieves data from one or more sources to represent one or more values within the report, wherein a mapper generates a relationship between the data from the one or more sources and the one or more values to be placed within the report,” as recited in claim 1, and similarly recited in claims 17, 29, 30, 42, and 54.

Therefore, *Hamscher* fails to cure the above-identified deficiencies of *Saxton* and *Polizzi*, and Applicants respectfully request that the Examiner withdraw the rejection of claims 3, 4, 19, 20, 32, 33, 44, 45, 56, and 57 under 35 U.S.C. § 103(a).

**V. Regarding the rejection of claims 8-10, 23, 36, 47, 48, and 58 under 35 U.S.C. § 103(a) as being unpatentable over *Saxton*, in view of *Polizzi*, and further in view of *Clancey***

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 8-10, 23, 36, 47, 48, and 58 because a *prima facie* case of obviousness has not been established with respect to these claims.

The Examiner admits that the combination of *Saxton* and *Polizzi* does not disclose “wherein one or more templates are used to develop the report, which contain data that is directly inserted into the report and instructions enabling data from the one or more sources to be inserted into the report” (Office Action at page 10). However, the Examiner relies on *Clancey* for allegedly teaching these claimed elements (Office Action at page 10).

Even assuming this allegation is true, which Applicants do not concede, *Clancey* fails to cure the deficiencies of *Saxton* and *Polizzi* discussed above. *Clancey* discloses “a computer-implemented method of creating and editing a document containing one or more terms” (col. 1, lines 41-43). *Clancey* does not teach or suggest “an editor that develops a report by referencing the software elements created from the one or more text documents to form a structure of the report and retrieves data from one or more sources to represent one or more values within the report, wherein a mapper generates a relationship between the data from the one or more sources and the one or more values to be placed within the report,” as recited in claim 1, and similarly recited in claims 17, 29, 30, 42, and 54.

Therefore, *Clancey* fails to cure the above-identified deficiencies of *Saxton* and *Polizzi*, and Applicants respectfully request that the Examiner withdraw the rejection of claims 8-10, 23, 36, 47, 48, and 58 under 35 U.S.C. § 103(a).

## **VI. Conclusion**

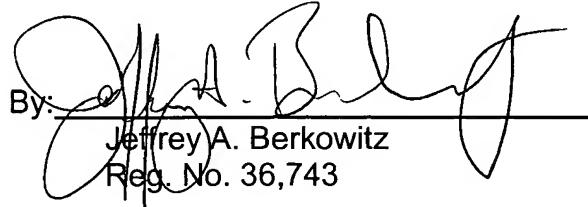
In view of the foregoing remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Customer No. 22,852  
Attorney Docket No.: 07643.0042-00  
Application No.: 10/052,250

Please grant any extensions of time required to enter this response and charge  
any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

By:   
Jeffrey A. Berkowitz  
Reg. No. 36,743

Dated: August 16, 2006